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Training School, New Jersey Juvenile Justice  
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and Kelly Michaelowski

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

WILLIAM D. BROWN,

Plaintiff,

v.

KELLY MICHAELOWSKI;  
JACK AMBERG;  
NEW JERSEY TRAINING SCHOOL;  
NEW JERSEY JUVENILE JUSTICE  
COMMISSION;  
NEW JERSEY DEPARTMENT OF  
LAW AND PUBLIC SAFETY;  
STATE OF NEW JERSEY; and  
JOHN DOES 1 to 10,  
Defendants.

**Docket No. 3:13-cv-04939-JAP-LHG**

Civil Action

**NOTICE OF MOTION  
TO DISMISS AMENDED  
COMPLAINT**

**ELECTRONICALLY FILED**

TO: Clerk of the Court  
United States District Court for the District of New Jersey  
Trenton Vicinage

Matthew B. Weisberg, Esq.  
Prochniak Weisberg, PC  
7 South Morton Avenue  
Morton, PA 19070  
*Attorney for Plaintiff*

PLEASE TAKE NOTICE that on January 6, 2014, or at such other time as it may please the Court, the undersigned John J. Hoffman, Acting Attorney General of New Jersey, by Deputy Attorney General Erica R. Heyer, appearing for Defendants, New Jersey Training School, New Jersey Juvenile Justice Commission, New Jersey Department of Law & Public Safety, the State of New Jersey and Kelley Michalowski, shall move for entry of an Order dismissing Plaintiff's Amended Complaint with Prejudice.

PLEASE TAKE FURTHER NOTICE that the Defendants will rely upon the Brief and Certification of Counsel submitted in support of this Motion.

Oral argument is requested in the event this Motion is opposed.

A proposed form of Order is submitted herewith.

Respectfully Submitted,

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: s/ Erica R. Heyer  
Erica R. Heyer  
Deputy Attorney General

DATED: December 2, 2013